STATE OF NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES OIL CONSERVATION COMMISSION () () ()

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION COMMISSION FOR THE PURPOSE OF CONSIDERING:

*1519*3 CASE NO.15793

APPLICATION OF FRONTIER FIELD SERVICES, LLC FOR AUTHORIZATION TO INJECT, LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

Frontier Field Services, LLC ("Applicant") provide this Pre-Hearing Statement as required by the rules of the Commission.

APPEARANCES

APPLICANT

Frontier Field Services, LLC

APPLICANT'S ATTORNEY

J. Scott Hall, Esq. Seth C. McMillan, Esq. MONTGOMERY & ANDREWS, P.A. P.O. Box 2307 Santa Fe, NM 87504-2307 Tele (505) 982-3873 shall@montand.com

OTHER PARTIES

Oil Conservation Division

OTHER PARTY'S ATTORNEY

Gabriel Wade, Esq. 1220 S. St. Francis Drive Santa Fe, NM 87505 (505)476-3451 Gabriel.wade@state.nm.us

STATEMENT OF THE CASE

Applicant, Frontier Field Services, LLC seeks an amendment to Orders Nos. R-13443-A and R-13443-B to provide for an increase of the maximum rate of injection of treated acid gas and plant wastewater into the Wolfcamp formation through two previously approved AGI wells located near Applicant's Maljamar Processing Plant.

> Maljamar AGI Well No. 1 API No. 30-0 130' FSL and 1,830' FEL Section 21 T-17-S, R-32-E, NMPM

Maljamar AGI Well No. 2 API No. 30-0 400' FSL and 2,100' FEL (Surface) 350' FSL and 650' FWL (Bottom Hole) Section 21 T-17-S, R-32-E, NMPM

Applicant also requests that the Commission delegate to the Division authority to review

and approve further modifications to Applicant's injection authorization as it deems appropriate.

PROPOSED EVIDENCE

<u>APPLICANT</u>

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Coy Bryant, Petroleum Engineer	10 minutes	2
Alberto Gutierrez, Geologist	20 minutes	1

OTHER PARTY

The Division is to submit a statement of support for the Application, but does not plan to provide witness testimony.

PROCEDURAL MATTERS

None.

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Respectfully submitted,

MONTGOMERY & ANDREWS, P. A.

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Attorneys for Frontier Field Services

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by electronic mail this 3rd day of September, 2015.

Gabriel Wade, Esq. New Mexico Oil Conservation Division 1220 S. St. Francis Drive Santa Fe, New Mexico 87505

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